

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

RON TREDENNICK,)	
)	
Plaintiff,)	Case No.:
)	
)	
v.)	
)	
WRIGHT MEDICAL TECHNOLOGY,)	
INC.,)	
)	
Defendant.)	

NOTICE OF REMOVAL

Defendant, Wright Medical Technology, Inc. ("Wright Medical"), by its attorneys Howard & Howard Attorneys PLLC, pursuant to 28 U.S.C. §§ 1332, 1441 and 1446, removes this action from the Circuit Court for Will County, Illinois, to the United States District Court for the Northern District of Illinois, and in support of the Notice of Removal states:

1. On March 3, 2010, a civil action was commenced, and is now pending, in the Will County Circuit Court, State of Illinois, entitled "RON TREDENNICK, Plaintiff, V. WRIGHT MEDICAL TECHNOLOGY, INC., a Delaware corporation, Defendant," being Case No. 10-L-00186 in the files and records of that Court.

2. Wright Medical first received copies of the Summons and Complaint in the above-referenced Will County Circuit Court action on March 10, 2010. A copy of the Summons and Complaint (and its exhibits), together with all other process, pleadings and orders, if any, served on Defendant Wright Medical, are attached hereto as **Exhibit A**.

3. Wright Medical is the only defendant named in this action.

4. Wright Medical has not filed any pleadings in the above-referenced Will County Circuit Court action, nor have any substantive proceedings been had in such action.

5. This Notice of Removal is being timely filed within 30 days after the date upon which Wright Medical first received the Summons and Complaint in the above-referenced Will County Circuit Court action.

6. The above-referenced Will County Circuit Court action is one of which this Court has original jurisdiction on the basis of complete diversity of citizenship and an amount in controversy in excess of \$75,000, exclusive of interest and costs, under the provisions of 28 U.S.C. §1332(a), and is one that may be removed to this Court by Wright Medical pursuant to the provisions of 28 U.S.C. §1441(a) and pursuant to the procedures set forth in 28 U.S.C. §1446 for the following reasons:

a. This is a civil action filed by Plaintiff Ron Tredennick against Wright Medical arising out of alleged injuries incurred as a result of a medical product manufactured by Wright Medical.

b. Ron Tredennick, upon information and belief, was a citizen of the State of Illinois at the time of the commencement of this action, and is now a citizen of the State of Illinois [Complaint, ¶ 1].

c. Wright Medical was a citizen of the State of Delaware at the time of commencement of this action, and is now a citizen of the State of Delaware, and therefore, Wright Medical was not, and is not, a citizen of the State of Illinois.

d. This is a controversy between a citizen of the State of Illinois and a citizen of the state of Delaware, and consequently, the controversy is between citizens of different states.

e. The Complaint contains four counts for separate causes of action, each count seeking in excess of \$50,000.00. The aggregate monetary relief sought in the Complaint is \$200,000.00, and therefore the amount in controversy exceeds the sum or value of \$75,000.00 and satisfies the jurisdictional requirements of 28 U.S.C. §1332.

7. A copy of this Notice of Removal is being filed with the Clerk of the Court of the Will County Circuit Court, State of Illinois, together with a Notice of Filing Notice of Removal.

8. A copy of this Notice of Removal, together with a copy of the Notice of Filing a Notice of Removal, is being served on Plaintiff.

WHEREFORE, Defendant Wright Medical Technology, Inc. respectfully requests that the above-referenced action be removed from the Will County Circuit Court, State of Illinois, to the United States District Court for the Northern District of Illinois.

Dated: March 22, 2010

Respectfully submitted,

WRIGHT MEDICAL TECHNOLOGY, INC.

By: /s/Stephanie A.S. Stinton
Stephanie A.S. Stinton

Stephanie A.S. Stinton (ARDC #6293894)
Howard & Howard Attorneys, PLLC
200 South Michigan Avenue, Suite 1100
Chicago, Illinois 60604
(312) 372-4000